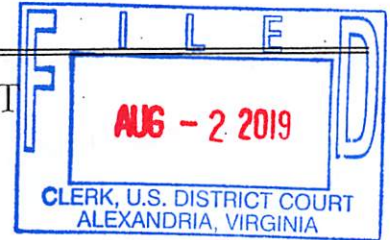


AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia



United States of America

v.

RENE CHAVARRIA

Case No. 1:19-MJ-351

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 1, 2019 in the county of Loudoun in the  
Eastern District of Virginia, the defendant(s) violated:

*Code Section*

21 U.S.C. § 952(a)

*Offense Description*

Importation of a controlled substance into the United States

This criminal complaint is based on these facts:

See attached affidavit.

☐ Continued on the attached sheet.

SAUSA Garland Rowland/AUSA Michael Ben'Ary

*Complainant's signature*

Daniel Brazier, Special Agent, HSI

*Printed name and title*

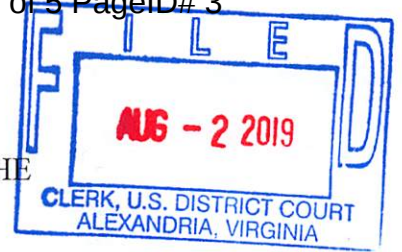
Sworn to before me and signed in my presence.

Date: August 2, 2019

City and state: Alexandria, VA

/s/

Ivan D. Davis  
United States Magistrate Judge



IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

RENE CHAVARRIA

Case No. 1:19-MJ-351

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Special Agent Daniel Brazier, being duly sworn, depose and state as follows:

1. The facts set forth in this affidavit are based on my personal knowledge and review of records, documents, and other physical evidence obtained during this investigation, as well as information conveyed to me by other law enforcement officials. This affidavit does not include each and every fact observed by me or known to the government. I have set forth only those facts necessary to support a finding of probable cause.

2. I am a Special Agent with the U.S. Immigration and Customs Enforcement, Homeland Security Investigations division and have held this position for approximately 10 years. During that time, I have received specialized training and have conducted numerous investigations relating to administrative and criminal violations of Federal law. My duties include investigating administrative and criminal violations of Federal law pertaining to economic, transportation and infrastructure security. The facts provided in this affidavit support probable cause that the defendant, RENE CHAVARRIA, did unlawfully, knowingly, and intentionally import into the United States from a place outside thereof 500 grams or more of a mixture and

substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 21, United States Code, Sections 960(a)(1) & (b)(2)(B)(ii).

3. On August 1, 2019 at approximately 0618 hours, the defendant arrived at Dulles International Airport in Loudon County, VA, which is in the Eastern District of Virginia, on United Airlines Flight 860 from San Paolo, Brazil. The defendant was carrying a black carryon bag and black laptop bag. At approximately 0645 hours, the defendant was referred to a secondary inspection area and was identified by Customs and Border Patrol (CBP) as RENE CHAVARRIA by his U.S. passport.

4. At approximately 0715 hours, CBP officers inspected the defendant's bags and found packages sewn into the lining of the black carryon bag and black laptop bag. These packages contained a powdery substance that was suspected to be cocaine. At approximately 0737 hours, CBP officers conducted a field test of the white powdery substance, which resulted in a positive result for cocaine.


5. CBP officers detained the defendant, who agreed to speak with law enforcement after signing a written waiver of his Fifth Amendment rights. The defendant told law enforcement that he had received the black carryon bag and black laptop bag in Sao Paolo, Brazil after his girlfriend instructed him to retrieve them. The defendant stated that he has never met his girlfriend in person, despite having a relationship with her for three years. The defendant stated that they communicate only via messages on social media, and that he has given her more than \$230,000 to assist with her modeling career in London. The defendant's girlfriend told him that

the bags contained inheritance documents, which he was to bring with him to Hong Kong in order to collect the inheritance and recover the money he had given her.


6. The defendant further stated that he had arrived in San Paolo, Brazil on July 29, 2019 and was picked up at airport by a woman who brought him to a hotel. At the hotel, a man delivered the black carryon bag and black laptop bag to the defendant. The defendant told law enforcement that he suspected that the bags contained illegal narcotics because they were too heavy to simply contain documents. He communicated with his girlfriend via social media after picking up the bags at the hotel, and she assured him that the bags contained documents that were sewn into the lining of the bags. The defendant told law enforcement that he remained suspicious that the bags contained illegal narcotics at that time. He also admitted to law enforcement that he believed CBP would find illegal narcotics when they began inspecting the bags.

7. Based upon the foregoing, there is probable cause to charge RENE CHAVARRIA with unlawfully, knowingly, and intentionally importing into the United States from a place outside thereof 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 21, United States Code, Sections 960(a)(1) & (b)(2)(B)(ii).

Respectfully submitted,

  
\_\_\_\_\_  
Daniel Brazier  
Special Agent  
U.S. Immigration and Customs Enforcement

Subscribed and sworn to before me  
on this 2nd day of August, 2019:

 /s/ \_\_\_\_\_  
Ivan D. Davis  
United States Magistrate Judge